

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OKLAHOMA

VIDEO GAMING TECHNOLOGIES,
INC.,

Plaintiff,

vs.

CASTLE HILL STUDIOS LLC, *et al.*

Defendants.

CASE NO. 17-CV-00454-GKF-JFJ

**DEFENDANTS' MOTION TO SEAL OPPOSITION TO PLAINTIFF VIDEO
GAMING TECHNOLOGIES INC.'S MOTION IN LIMINE REGARDING
THIRD PARTY GAMES AND SUPPORTING DECLARATION**

Pursuant to Local Rule 79.1, and paragraph 2(f) of the Stipulated Protected Order (ECF No. 55) (the "Protective Order"), Defendants Castle Hill Studios LLC, Castle Hill Holdings LLC, and Ironworks Development LLC (together "Castle Hill"), hereby request that the Court enter an order sealing Defendants' unredacted Opposition to Plaintiff Video Gaming Technology Inc.'s Motion in Limine Regarding Third Party Games and the Declaration of Robert C. Gill in support thereof (collectively, ECF No. 217). In support of this request to seal, Defendants state as follows:

1. Portions of the Opposition contain information designated by Plaintiff and Defendants as Confidential, Highly Confidential Information, or Highly Confidential Source Code Information pursuant to paragraph 2(c) of the Stipulated Protective Order (ECF No. 55).

2. **Exhibits A, B, E, and F** to the Declaration consist of excerpts of depositions, portions of which were designated as Confidential or Highly Confidential pursuant to the Stipulated Protective Order.

3. **Exhibit C** to the Declaration consists of an excerpt from Defendants' Fourth Supplemental Objections and Responses to Plaintiff's First Set of Interrogatories, portions of which were designated as Confidential or Highly Confidential pursuant to the Stipulated Protective Order.

4. **Exhibit D** to the Declaration consists of correspondence from Henry Platt to Michael Sawyer discussing Confidential or Highly Confidential information pursuant to the Stipulated Protective Order.

5. **Exhibits G, H, I, J, K, and L** to the Declaration consist of documents produced in discovery and marked as exhibits in depositions. All of these documents were designated as either Confidential or Highly Confidential pursuant to the Stipulated Protective Order.

6. Pursuant to Local Rule 79.1, General Order 08-11, and the Protective Order, Castle Hill filed both a public, redacted Opposition with public, redacted versions of all exhibits, and a sealed, unredacted Opposition, and a sealed, unredacted version of all exhibits described herein.

WHEREFORE, Defendants respectfully request that the Court enter an Order sealing the Opposition and exhibits to the Declaration as set forth herein.

Dated: November 16, 2018

Respectfully submitted,

/s/ Robert C. Gill
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CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of November, 2018, I caused a copy of the foregoing **DEFENDANTS' MOTION TO SEAL OPPOSITION TO PLAINTIFF VIDEO GAMING TECHNOLOGIES INC.'S MOTION IN LIMINE REGARDING THIRD PARTY GAMES AND SUPPORTING DECLARATION** to be filed using the Court's ECF system, which will provide electronic notification of filing to the following counsel for Plaintiff:

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